

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KAMILAH JOLLY; DIEGO ALVAREZ-MIRANDA EZPELETA; and VAUGHN BOBB-WILLIS; individually and on behalf of all others similarly situated,

Plaintiffs,

v.

FURTHERED, INC. d/b/a LAWLINE, INC.,

Defendant.

Case No. 1:24-cv-06401-LJL

(consolidated with Case No. 1:24-cv-06709)

Hon. Lewis J. Liman

**DECLARATION OF JOSHUA BRIONES IN SUPPORT OF
DEFENDANT'S MOTION TO DISMISS PLAINTIFFS'
SECOND AMENDED CLASS ACTION COMPLAINT**

I, Joshua Briones, make this declaration pursuant to 28 U.S.C. § 1746. I hereby state as follows:

1. I am a member with the law firm of Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C., counsel to Defendant FurtherEd, Inc. d/b/a Lawline (“Defendant”) in the above-captioned action.

2. I respectfully submit this declaration in support of Defendant’s Motion to Dismiss Plaintiffs’ Second Amended Class Action Complaint of Plaintiffs Kamilah Jolly; Diego Alvarez-Miranda Ezpeleta; and Vaughn Bobb-Willis (the “Motion to Dismiss”). Except for those matters set forth on information and belief, I make this declaration of my own personal knowledge. I could and would competently testify as to the matters set forth below if called upon to do so. As for the matters set forth on information and belief, I have been informed that they are true and, based upon such information, I believe them to be true.

3. The following documents are cited in the accompanying Memorandum of Law in Support of Defendant’s Motion to Dismiss. A true and correct copy of each document is attached hereto.

4. Attached hereto as **Exhibit 1** is a true and correct copy of the webpage: Meta Pixel, Meta for Developers, available at <https://developers.facebook.com/docs/meta-pixel>, and obtained on February 27, 2025.

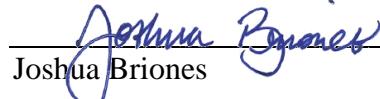
I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on February 28, 2025 in Los Angeles, California.



Joshua Briones

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.



Joshua Briones